

USEPA/OECA/OC
State and Tribal Assistance Grants (STAG) 1999-2000
Connecticut: Developing a Compliance Measurement and Management Strategy
for Connecticut's General Permit Program
4th Quarter Report, 2002
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**Quarterly Reporting Form for EPA's
Enforcement and Compliance Assurance Grants**

Reporting Period: July-Sept Year: FY 2002
(updates revised 01/29/02 are in italics)

I. Information

Grantee: Connecticut Department of Environmental Protection
Title of Project: Developing a Compliance Measurement and Management Strategy for Connecticut's General Permit Program
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Funds Received by State: September 1999: \$100,000
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II. Status of Project Milestones

Each milestone for the entire project should be entered into this table at the beginning of the grant period and should appear in every quarterly report (unless it is dropped from the project). With each quarterly report fill in dates or add milestones as appropriate. If dates or milestones are adjusted in subsequent reports, please indicate this in the comment field or in text below the table.

Project Milestones	Anticipated Completion Date	Completion Date
Orientation Meeting and Project Management		Completed
Work Plan Development		Completed
<i>Phase I: General Permit for the Discharge of Minor Tumbling or Cleaning of Parts Wastewater:</i>		
Objectively Determine Baseline Compliance		Completed
Request Monitoring Data from Registrants		Completed
Determine the Root Causes of Noncompliance		Completed
Enforcement Follow-up for Noncompliance		Completed
Development and Distribution of Compliance Assistance Tools		Completed
Second Request for Monitoring Data from Registrants	December 2002	
Evaluation of Compliance Assistance Efforts	May 2003	
Identify Facilities Remaining in Noncompliance for Enforcement Targeting	September 2003	
<i>Phase II: General Permit for the Discharge of Minor Printing and Publishing Wastewater:</i>		
Evaluate Current Baseline Compliance		Completed
Determine Root Cause of Noncompliance		Completed
Develop and Distribute Compliance Assistance Tools		Completed ¹
Evaluate Compliance Assistance Efforts	December 2002	Ongoing
<i>Phase III: General Permit for Title V Minors:</i>		
Develop an Inspection Checklist and Audit Protocol		Completed
Identify a Random Sample of Facilities to be Audited		Completed
Conduct On-site Audits		Completed
Calculate Compliance Rate		Completed
Determine Root Causes of Noncompliance		Completed
Facilitate Training for CTDEP Enforcement Staff	<i>December 2002</i>	
Communicate Results	<i>December 2002</i>	

¹ Based on the fact that the printer universe was larger than originally estimated (1100 vs. 400), the Department decided to use existing outreach materials and distribute them to the larger universe.

III. Status of Project Completion.

Anticipated project completion date:

Phase I: A second request for monitoring data from registrants will be mailed at the end of December 2002. The subsequent data analysis and enforcement follow-up is expected to be completed by September 2003.

Phase II: Eligible printers had until July 1, 2002 to apply for the general permit. The Department is in the process of conducting inspections at a portion of the non-responders and anticipates the inspections will be completed during FFY 2003.

Phase III: Completion date is anticipated to be December 2002.

Milestone completion dates for Phase III have been extended. A draft final report was submitted by ERG. *The draft report is currently under review by the Department. Once the final report has been approved, the staff training session will be scheduled.*

IV. Results:

Phase I: It is too early in the initiative to measure the outcomes relative to compliance rates, however the accuracy of the general permit registrants database has been improved. Many registrants were no longer discharging and a review of the data submitted revealed many registrants that require individual permits. The Department has, for the first time, objectively assessed compliance rates for a general permit.

The Department took enforcement action against sixteen non-compliant companies who failed to conduct the monitoring as required by the general permit. Fifteen registrants signed administrative consent orders with penalties totaling nearly \$103,000. The Department referred the sixteenth company to the Office of the Attorney General for the filing of a civil action. This has caused a heightened awareness of the importance of complying with general permit requirements in the regulated community.

The Department followed up on 19 facilities that indicated discharges that were not eligible for coverage under the general permit. Three facilities applied for individual permits, 2 facilities' individual permits have been modified to incorporate tumbling and cleaning discharges, twelve facilities eliminated discharges of tumbling and cleaning wastewaters and the Department is working with the remaining two facilities to determine whether individual permits are required.

Phase II: The main objective of Phase II is to increase registrations under the printing general permit. At the time this initiative began, the Department had record of less than 60 registrants. Earlier information indicated approximately 400 printers in the state. The Department obtained a more current list from the Department of Economic Development and this list identified a potential universe of up to 1180 printers in the State.

In January 2002, the Department mailed to 1123 printers (those already permitted were not sent packages) a copy of the general permit, a general permit registration form, printing and publishing environmental fact sheets and a questionnaire to be returned to the Department by July 1, 2002. Unpermitted dischargers of printing and publishing wastewaters were offered a limited time to register for the printing general permit or to apply for an individual permit, as necessary, without fear of enforcement for not having obtained a permit in a timely manner.¹ In May 2002, the Department mailed a reminder letter to recipients of the earlier mailing that had

¹ In addition printers were offered a complimentary copy of the CD ROM entitled "Preventing Pollution: An Environmental Resource for Lithographic Printers", developed by the Northeast Waste Management Official's Association. To date, 97 copies of the CD have been distributed at the request of printers.

not yet responded.

Of the 1123 packages mailed, 1020 were delivered and 103 were returned as undeliverable. The response rate for packages delivered was 53.8% (549/1020). Sixty six percent of responses (362/549) indicated that they did not discharge wastewater as part of their operations or that they no longer engaged in the printing/publishing business. Eight percent of the respondents (44/549) indicated that wastewaters are shipped off-site. Twenty-six percent (143/549) of those responding indicated an on-site discharge. Of the them, thirteen percent were permitted (19/143). Of the remaining one hundred twenty-four, 62 (50%) submitted registrations or fees under the printing general permit and 62 (50%) indicated a discharge, but did not submit a registration. There was no response from 471 (46.2%) of those mailed a package.

Next Steps

The Department has further defined its approach to conducting site inspections at a portion of the non-responders. The Department will conduct a total of 15 inspections at printers in unsewered areas and 15 in sewerred areas. Sites with higher sales figures will be targeted as it is expected these operations will result in larger volume discharges.

Department records indicate that 90 general permits have been issued to date as a result of this initiative and many are still pending issuance. Since July 25, 2002, (date of last update), an additional 28 permit registrations have been received by the Department.

Phase III: The results of the audits showed an excellent (100%) compliance rate with respect to sources' compliance with the GPLPE emission limits. A high compliance rate was expected as audits were limited to facilities that voluntarily participated in the initiative. A lower compliance rate was found with respect to some of the record keeping requirements in the GPLPE. The latter finding has been reflected in DEP inspections of these sources over the years and was one reason why the revisions to the GPLPE finalized in March 2001 included revisions to the cumbersome record keeping and reporting requirements contained therein.